

REMARKS

Claims 1-20 and 23-48 are pending in this application. Claims 1-3, 25, 33 and 46 have been amended by the present Amendment. Amended claims 1-3, 25, 33 and 46 do not introduce any new subject matter.

REJECTIONS UNDER 35 U.S.C. § 102(b)

Reconsideration is respectfully requested of the rejection of claims 1-2, 4-8, 11-16,¹ 18-20 and 23-24 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,794,164 ("Beckert").

In rejecting claims 1-2, 4-8, 11-16, 18-20 and 23-24 under 35 U.S.C. § 102(b), the Examiner states that Beckert discloses a connector "'positioned on a member for physically coupling said at least one of said two or more displays to said assembly housing', i.e., connector ports 510 positioned on a bus structure 508 for physically coupling the at least one of two or more displays 512 to the assembly housing computing unit 504". January 14, 2004 Office Action at 3.

Applicants respectfully disagree with the Examiner's conclusion and have amended claim 1 to clearly distinguish the claimed subject matter from the cited reference.

Claim 1 has been amended to recite a connector for electrically coupling a display to a bus, wherein the connector is integrated into a member for physically mounting the display on an assembly housing. The member is disposed on the display and provides support for the display.

¹ Applicants note that the Examiner has not provided any explanation for the rejection of claims 11 and 12 under 35 U.S.C. § 102(b). Accordingly, Applicants note that the stated rejection of claims 11-16 may be a typographical error, wherein Examiner meant to reject claims 13-16 under 35 U.S.C. § 102(b) instead of claims 11-16.

**The Connector and Member Recited in Claim 1 Are Clearly Not Anticipated
By The Connector Ports Tied To A Data Network Disclosed In Beckert**

Connector ports provided throughout a data network fail to teach or suggest a connector integrated into a member for mounting a display on an assembly housing. Beckert discloses that connector ports 510 are provided at "the rear of five passenger seats" in a vehicle and that client processing units 512 can connect to the each network connection port 510. Beckert, col. 12, lines 60-66. In stark contrast to the claimed embodiment, the connector ports are not integrated into a member for mounting a display on the assembly housing, as recited in claim 1. See, e.g., Fig. 5. Indeed, all that is disclosed in Beckert is that connector ports are provided at the rear of each seat.

Nothing further is taught or suggested regarding the mounting of a client processing unit once it has been connected to a connector port. Moreover, the data network to which the connector port is coupled is not even remotely the same as a member for physically mounting the display on the assembly housing. Indeed, the data network is more than likely a wire connection to the computing unit 504, which is incapable of mounting a display on the assembly housing. Furthermore, the "assembly housing" computing unit 504 is mounted in the dashboard (see col. 12, lines 47-49) away from the connection port, making it impossible to use a connector port provided on a passenger seat in, for example, the rear of a vehicle, to mount a display on the assembly housing in the front of the vehicle. Therefore, not only does Beckert fail to disclose the claimed configuration, Beckert also teaches away from same.

**Beckert Fails To Teach The Connector Integrated Into A Member Disposed
On And Providing Support For The Display As Recited In Claim 1**

Beckert also fails to teach or suggest the member including the connector

wherein the member is disposed on the display for mounting and supporting the display. As stated above, Beckert contains no disclosure regarding the mounting of a client processing unit once it has been connected to a connector port. In addition, there is no disclosure regarding positioning the member on the display or regarding support for a display. Further, the data network 508 is not disposed on the client processing unit, nor does it provide support for the client processing unit.

Therefore, Applicants respectfully submit that claims 1-2, 4-8, 11-16, 18-20 and 23-24 are not anticipated by Beckert. Beckert does not disclose or suggest a connector for electrically coupling a display to a bus, wherein the connector is integrated into a member disposed on the display for physically mounting the display on an assembly housing, as recited in amended claim 1. This feature is neither expressly nor inherently disclosed or suggested in the cited reference.

Because Beckert does not disclose or suggest the configuration recited in independent claim 1, Applicants respectfully submit that independent claim 1 is not anticipated by Beckert. Claims 2, 4-8, 11-16, 18-20 and 23-24 ultimately depend from claim 1, which, the reasons stated hereinabove, is submitted not to be anticipated by the cited reference. For at least those very same reasons, claims 2, 4-8, 11-16, 18-20 and 23-24 are also submitted not to be anticipated by the cited reference. Therefore, Applicants respectfully request that the Examiner withdraw her rejection of claims 1-2, 4-8, 11-16, 18-20 and 23-24 under 35 U.S.C. § 102(b).

REJECTIONS UNDER 35 U.S.C. § 103(a)

Reconsideration is respectfully requested of the rejection of claims 3, 9-12 and 47-48 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of U.S.

Patent No. 6,339,696 ("Chan"). Applicants respectfully submit that the amendment made to independent claim 1 renders claims 3 and 9-12 patentable over the cited references. Further, with respect to claims 11, 47 and 48, Applicants continue to maintain that the embodiments in claims 11, 47 and 48 are not rendered obvious by the cited references.

**Claim 1 And The Claims Dependent Thereon
Are Patentable Over Beckert In View Of Chan**

Applicants respectfully submit that Beckert, when taken alone or in combination with Chan, fails to teach or suggest the connector integrated into the member for physically mounting the display on an assembly housing, wherein the member is disposed on the display and provides support for the display, as recited in amended claim 1.

As stated above, Beckert fails to teach or suggest the limitations recited in claim 1. Furthermore, Chan contains no teaching regarding the integration of a connector into a member for mounting the display on an assembly housing. Further, there is no disclosure regarding a member being disposed on the display or providing support for the display. Indeed, when referring to Chan, Fig. 8 and its corresponding description show a display in general do not include any detail regarding the mounting of the display or an electrical connection to or from the display.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the connector and member configuration, as defined in newly amended claim 1. It is respectfully submitted that it would not have been obvious to modify Beckert, in view of Chan, to develop the design of an embodiment of the present invention, as recited in claim 1.

Accordingly, Applicants respectfully submit that the embodiment of the invention, as defined in amended claim 1, is patentable over Beckert, in view of Chan. For at least the reason that claims 3 and 9-12 depend from claim 1, claims 3 and 9-12 are also submitted to be patentably distinct over the cited references. As such, Applicants request that the Examiner withdraw her rejection of claims 3 and 9-12 under 35 U.S.C. §103(a).

**The Wireless Transmitters And Wireless Receivers For
Transmitting And Receiving Video Signals As Recited In Claims 11,
47 And 48 Are Not Rendered Obvious By Beckert In View Of Chan**

Claims 11 and 47 recite a wireless transmitter coupled to a media source for wirelessly transmitting a video signal to two or more displays, wherein each of the two or more displays includes a wireless receiver for wirelessly receiving the video signal.

Claim 48 recites a wireless transmitter coupled to said a media source for wirelessly transmitting first and second video signals to two displays, wherein each of the two displays includes a wireless receiver for wirelessly receiving the first and second video signals.

Applicants respectfully submit that the Examiner has failed to consider the specific limitations as recited in claims 11, 47 and 48 when rejecting same and has not satisfied her obligation to make a *prima facie* case of obviousness. See M.P.E.P. § 706.02(j). Further, the subject matter as recited in claims 11, 47 and 48 is patentable over the cited references.

Accordingly Applicants respectfully submit that claims 11, 47 and 48 be allowed, or, in the alternative, that the finality of the January 14, 2004 Office Action be withdrawn.

The Examiner has failed to establish *prima facie* obviousness of claims 11, 47 and 48

When rejecting claims 11, 47 and 48, the Examiner states that "it would have been obvious . . . to modify Beckert's system with Chan's teaching technique of further including a wireless transmitter at the video device for wirelessly transmitting audio signals to a wireless headphone set in order to provide the user his own personal enjoy in listening music as well as for his own selection in tuning channels". January 14, 2004 Office Action at 7. However, wireless transmission of audio signals is not the feature recited in claims 11, 47 and 48. As stated above, and in the October 2, 2003 Office Action Response (see p. 20), claims 11, 47 and 48 relate to wireless transmission of one or multiple video signals to multiple displays.

In ignoring the language of claims 11, 47 and 48, the Examiner has failed to properly compare the claims to the applied references, has not explained any proposed modification of the applied references necessary to arrive at the claimed subject matter, and has not explained why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification. See M.P.E.P. § 706.02(j). Indeed, in both the July 2, 2003 and the January 14, 2004 Office Actions, the Examiner has stated a rejection based on the wrong claim language and, accordingly, has failed to provide any proper basis for the rejections.

Therefore, Applicants respectfully submit that the Examiner allow claims 11, 47 and 48. Alternatively, Applicants respectfully request that the Examiner withdraw the finality of the Office Action and issue an appropriate Office Action with proper consideration of the claimed features.

**The features as recited in claims 11, 47 and 48
are patentable over the cited references**

Applicants respectfully submit that wireless transmission of one or multiple video signals to receivers in multiple displays is not disclosed or suggested by the cited references.

As admitted by the Examiner, Beckert fails to address a wireless transmitter coupled to a media source. January 14, 2004 Office Action at 7. The Examiner relies on Chan for curing this deficiency. However, Chan does not have any disclosure regarding wireless transmission of video signals. Chan relates only to transmission of an audio signal to a wireless radio frequency receiver, but fails to show wireless transmission within a vehicle of a video signal from a video player to a wireless receiver in a display. Indeed, Chan explains a physical connection between the video player and display for transmission of video signals to a display. See col. 5, lines 13-32 and Fig. 1.

Furthermore, it is only with the use of impermissible hindsight that the Examiner may conclude that a reference disclosing wireless transmission of audio signals renders obvious wireless transmission of video signals to multiple displays within a vehicle. Therefore, Applicants respectfully submit that Chan fails to cure the deficiency in Beckert. Accordingly, Applicants respectfully submit that claims 11, 47 and 48 are patentable over the cited references. As such, Applicants request that the Examiner withdraw her rejection of claims 11, 47 and 48 under 35 U.S.C. §103(a).

Claim 17 Is Patentable Over Beckert

Reconsideration is respectfully requested of the rejection of claim 17 under 35 U.S.C. § 103(a) as being unpatentable over Beckert. Applicants respectfully submit that

the amendment made to independent claim 1 renders claim 17 patentable over the cited reference.

As argued above, Applicants respectfully submit that Beckert fails to teach or suggest the connector and member configuration, as recited in amended claim 1. For at least the reason that claim 17 depends from claim 1, claim 17 is submitted to be patentably distinct over the cited reference. As such, Applicants request that the Examiner withdraw her rejection of claim 17 under 35 U.S.C. §103(a).

Claims 25 And 33 And The Claims Respectively Dependent Thereon Are Patentable Over Beckert In View Of Lee

Reconsideration is respectfully requested of the rejection of claims 25-32, 33-37, 39 and 41-43 and 46 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of U.S. Patent No. 6,283,299 ("Lee").

Claim 25 recites a display device for a vehicle including a member disposed on a display for mounting the display on an assembly housing, and an electrical connector for electrically coupling the display to a bus, wherein the electrical connector is integrated into said member.

Claim 33 recites a display device for a vehicle including a member disposed on the display for selectively mounting the display on an assembly housing, and an electrical connector within the member for connecting the display to a bus.

Applicants respectfully submit that Beckert, when taken alone or in combination with Lee, fails to teach or suggest members and the electrical connectors integrated and within the members, as recited in amended claims 25 and 33.

As argued above, Beckert fails to disclose a member disposed on a display device for mounting the display device on an assembly housing, wherein the member

includes an electrical connector within the member for connecting the display to a bus. Lee cannot be combined with Beckert to result in the claimed configuration. In contrast to the member claimed in claims 25 and 33, Lee teaches the use of Velcro to physically hold the display in place and wires to electrically connect the display to the media player. See Lee, Figs. 2 and 4. The configuration in Lee, therefore, teaches away from a member including an electrical connector integrated therein, as recited in amended claims 25 and 33.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the member and electrical connector configuration, as defined in newly amended claims 25 and 33. Therefore, it is respectfully submitted that it would not have been obvious to modify Beckert, in view of Lee, to develop the configurations recited in independent claims 25 and 33.

Applicants respectfully submit that the embodiments of the invention as defined in amended claims 25 and 33 are patentable over Beckert, in view of Lee. For at least the reason that claims 26-32 depend from claim 25 and claims 34-37, 39, 41-43 and 46 depend from claim 33, claims 26-32, 34-37, 39, 41-43 and 46 are also submitted to be patentably distinct over the cited references. As such, Applicants request that the Examiner withdraw her rejection of claims 25-32, 33-37, 39, 41-43 and 46 under 35 U.S.C. §103(a).

**Claims 38, 40 And 44-45 Are Patentable
Over Beckert In View Of Lee And Chan**

Reconsideration is respectfully requested of the rejection of claims 38, 40 and 44-45 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of Lee and Chan.

Applicants respectfully submit that independent claim 33, as amended is patentable over the cited references and, as a result, claims 38, 40 and 44-45, which depend from claim 33 are also patentable over the cited references.

Further, as explained above in connection with claims 11, 47 and 48, the Examiner has failed to establish *prima facie* obviousness of claims 38 and 44.

**Claim 33 and the claims dependent thereon
are patentable over the cited references**

As argued above, Applicants respectfully submit that Beckert, when taken alone or in combination with Lee fails to teach or suggest the member for mounting the display on the assembly housing and the electrical connector within the member, as recited in claim 33. The addition of Chan does not change this result. As argued above, Chan contains no teaching regarding the integration of a connector into a member for mounting the display on an assembly housing and only generally shows a display without any detail regarding the mounting of the display or an electrical connection to or from the display.

For at least the reason that claims 38, 40 and 44-45 depend from claim 33, claims 38, 40 and 44-45 are submitted to be patentably distinct over the cited references. Therefore, Applicants request that the Examiner withdraw her rejection of claims 38, 40 and 44-45 under 35 U.S.C. §103(a).

The Examiner has failed to establish a *prima facie* case of obviousness of claims 38 and 44

Like claims 11, 47 and 48, discussed in detail above, claims 38 and 44 recite a wireless transmitter for wirelessly transmitting one or more video signals, wherein one or more displays include a wireless receiver for wirelessly receiving the video signal(s).

When rejecting claims 38 and 44, the Examiner states that "it would have been obvious . . . to modify Beckert and Lee's system with Chan's teaching technique of further including a wireless transmitter at the video device for wirelessly transmitting audio signals to a wireless headphone set in order to provide the user his own personal enjoy in listening music as well as for his own selection in tuning channels". January 14, 2004 Office Action at 11. However, wireless transmission of audio signals is not the feature recited in claims 38 and 44. As stated above, and in the October 2, 2003 Office Action Response (see p. 20), claims 38 and 44 relate to wireless transmission of one or more video signals to a display(s).

Like with claims 11, 47 and 48, the Examiner has failed to properly compare claims 38 and 44 to the applied references, has not explained any proposed modification of the applied references necessary to arrive at the claimed subject matter, and has not explained why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification. See M.P.E.P. § 706.02(j).

Therefore, Applicants respectfully submit that the Examiner allow claims 38 and 44. Alternatively, Applicants respectfully request that the Examiner withdraw the finality of the Office Action and issue an appropriate Office Action with proper consideration of the claimed features.

In addition, Applicants respectfully submit that wireless transmission of one or multiple video signals to a display(s) is not disclosed or suggested by the cited references.

As admitted by the Examiner, Beckert and Lee fail to address claimed limitations.

January 14, 2004 Office Action at 11. Further, as stated above, Chan does not have any disclosure regarding wireless transmission of video signals and fails to show wireless transmission within a vehicle of a video signal from a video player to a wireless receiver in a display. Accordingly, it is only with the use of impermissible hindsight that the Examiner can conclude that Chan renders obvious the features recited in claims 38 and 44. Therefore, Applicants respectfully submit that Chan fails to cure the deficiencies in Beckert and Lee and that claims 38 and 44 are patentable over the cited references. As such, Applicants request that the Examiner withdraw her rejection of claims 38 and 44 under 35 U.S.C. §103(a).

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, it is suggested that she telephone Applicants' Attorney to reach a prompt disposition of this application.

Respectfully submitted,



Michael F. Morano
Reg. No. 44,952
Attorney for Applicants

F. CHAU & ASSOCIATES, LLC
1900 Hempstead Turnpike
Suite 501
East Meadow, NY 11554
(516) 357-0091